



T. A. BLACKBURN LAW

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September 16, 2024

VIA ECF:

Hon. J. Paul Oetken, U.S.D.J.
Thurgood Marshall, United States Courthouse
40 Foley Square
New York, NY 10007

Re: Jones v. Combs, et al.; Case No. 24-1457

Dear Judge Oetken,

This firm represents Rodney Jones ("Plaintiff") in the above-referenced case. I am writing to request an extension of time to oppose the Combs Defendants' (minus Justin Dior Combs) motion to dismiss. This is the Plaintiff's first request. According to 3(C) of Your Honors individual rules, Plaintiff provides the following answers:

- 1) the original date and the new date requested: Original 9/9/24; New 9/30/2024
- 2) the number of previous requests for adjournment or extension: None
- 3) whether the previous requests were granted or denied: Not Applicable
- 4) whether the adversary consents and, if not, the reasons given by the adversary for refusing to consent: Adversary takes no position. I extended Counsel for the adversary, Ms. Erica Wolf, a generous amount of time to answer or move in this case when we met and conferred earlier this summer. I met and conferred with Ms. Wolf over the weekend via email, and she advised that she typically grants these requests, but because the filing deadline has passed, she is uncertain that she can grant the request absent Your Honors approval.
- 5) If a party requests to extend discovery beyond a previously scheduled conference, whether the conference should be adjourned (and, where relevant, proposing alternative dates): Not applicable.

I thought the filing deadline was September 16, 2024, 21 days after the motion was filed. Typically, that would be the schedule set during a pre-motion conference, but we did not have a pre-motion scheduling conference for this motion. I contacted Ms. Wolf for the extension over the weekend because I have been fighting COVID-19 and have been bedridden for close to a week. To her credit, Ms. Wolf was gracious in her emails, extending well wishes.



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I thank the Court for its time and consideration.

Respectfully Submitted,

Tyrone A. Blackburn, Esq.
Tyrone A. Blackburn, Esq.

CC: All attorneys of record via ECF.